

UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA
ROMANO GARUBO & ARGENTIERI Emmanuel J. Argentieri, Esquire 52 Newton Avenue, P.O. Box 456 Woodbury, New Jersey 08096 (856) 384-1515 Attorneys for Secured Creditor, Wilmington Savings Fund Society, FSB, not in its individual capacity, but solely as trustee of NRPL Trust 2019-1
HINSALEE BURRELL xxx-xx-9508

Case No. 25-12800-DJB

Chapter 13

### **NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that ROMANO GARUBO & ARGENTIERI, hereby enters its appearance as attorneys for Wilmington Savings Fund Society, FSB, not in its individual capacity, but solely as trustee of NRPL Trust 2019-1, Secured Creditor in the above proceeding, and pursuant to Bankruptcy Rule 2002 and 9010, requests that its name be added to the mailing list maintained by the Clerk in the above case and that all notices given or required to be given in this case and all papers served or required to be served in this case be given to and served upon the following:

ROMANO GARUBO & ARGENTIERI  
Emmanuel J. Argentieri, Esquire  
52 Newton Avenue, P.O. Box 456  
Woodbury, New Jersey 08096  
(856) 384-1515  
[bk@rgalegal.com](mailto:bk@rgalegal.com)

PLEASE TAKE FURTHER NOTICE that the foregoing request includes the notice and papers referred to in Rule 2002 of the Bankruptcy Rules and also includes, without limitation,

notices of any orders, pleadings, motions, applications, complaints, demands, hearings, requests or petitions, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document brought before this Court with respect to these proceedings, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise.

This appearance and request for notice is made without prejudice to Wilmington Savings Fund Society, FSB, not in its individual capacity, but solely as trustee of NRPL Trust 2019-1's rights, remedies and claims against other entities or any objection that may be made to the subject matter jurisdiction of the Court and shall not be deemed or construed to submit Wilmington Savings Fund Society, FSB, not in its individual capacity, but solely as trustee of NRPL Trust 2019-1 to the jurisdiction of the Court. All rights, remedies and claims are hereby expressly reserved, including without limitation, the making of a motion seeking abstention or withdrawal of the case or a proceeding therein.

Dated: July 23, 2025

ROMANO GARUBO & ARGENTIERI

/s/EMMANUEL J. ARGENTIERI  
EMMANUEL J. ARGENTIERI

ROMANO GARUBO & ARGENTIERI  
Emmanuel J. Argentieri, Esquire/59264  
52 Newton Avenue, P.O. Box 456  
Woodbury, New Jersey 08096  
(856) 384-1515 #59264  
[eargentieri@rgalegal.com](mailto:eargentieri@rgalegal.com)